

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

In re: Alex Michael Smith and)	
Stephanie Mae Smith,)	
)	
Debtor.)	Bk 22-12479-SAH
_____)	(Chapter 7)
)	
Stephanie Mae Smith,)	
Plaintiff,)	
)	
-vs-)	Adv. No. 24-01023-SAH
)	
United States Department of Education,)	
Defendant.)	

**APPLICATION TO EXTEND TIME TO FILE A MOTION, ANSWER, OR
OTHER RESPONSIVE PLEADING TO ADVERSARY COMPLAINT**

Cara Rodriguez, Assistant United States Attorney, on behalf of the United States of America, *ex rel.* Department of Education (“DOE”), files this Application for an extension of time to file a motion, an answer, and/or other responsive pleading. In support, the United States states the following:

1. The current deadline for filing an answer, motion, or other responsive pleading to the Plaintiff’s Complaint is April 18, 2024. This Adversary Proceeding was served upon the United States Attorney’s Office on March 18, 2024. Plaintiff is seeking the discharge of student loans. The United States Attorney’s Office has not yet received information from DOE.

2. The United States requests an extension of sixty (60) days, or until June 17, 2024, to file a motion, an answer, or other responsive pleading to the Debtor’s Complaint.

DOE has been inundated with Student Loan Bankruptcy Discharge cases, thereby impacting the ability of the United States to timely respond. Specifically, this has resulted in long delays in getting the information needed to properly respond to the underlying matters. An additional sixty days will hopefully provide DOE with enough time to give the undersigned the information needed to respond.

3. This is the first request for an extension of time and the United States is not aware of any matters pending that will be affected by this request.

4. Debtor's counsel has been contacted and has no objection to this request.

The United States respectfully requests a sixty (60) day extension of time to file a motion, answer, or other responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/ Cara Rodriguez

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CERTIFICATE OF SERVICE

X I hereby certify that on April 15, 2024, I electronically transmitted the above and foregoing Entry of Appearance and Request for Notices to the Clerk of the Court using the ECF System for filing and for transmitting a Notice of Electronic Filing to the ECF Registered Participants in the above captioned proceeding.

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___ Further, I certify that on April 15, 2024, a copy of this Notice was forwarded via U.S. Mail, postage prepaid and properly addressed to the parties listed below who are not registered with ECF.

s/ Cara Rodriguez
Assistant U.S. Attorney